



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
CITY VIEW PLAZA, SUITE 7000
#48 165 RD. KM 1.2
GUAYNABO, PR 00968-8069

JUN 19 2013

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Article Number: 7009 2250 0003 8661 6809

Alberto M. Lázaro Castro, P.E.
Executive President
Puerto Rico Aqueduct and Sewer Authority
P.O. Box 7066
San Juan PR 00916-9990

Honorable Carmen Yulín Cruz, Mayor
Municipality of San Juan
P.O. Box 9024100
San Juan, Puerto Rico 00902-4100

Re: Reconnaissance Inspection, April 5, 2013
Condado Lagoon Sanitary and Storm Sewer System
Municipality of San Juan ("MSJ") Municipal Separate Storm Sewer System ("MS4") Permit
(PRR040036)
PRASA Puerto Nuevo Wastewater Treatment Plant Collection System (PR0021555)

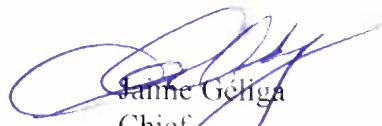
Dear Messrs. Lázaro and Cruz:

This letter is in reference to the National Pollutant Discharge Elimination System ("NPDES") Reconnaissance Inspection ("RI") conducted by the United States Environmental Protection Agency's ("EPA") Region 2, Caribbean Environmental Protection Division on April 5, 2013. This report indicates that certain potential non-compliance items and/or areas of concern which must be corrected and/or investigated to ensure compliance with your respective NPDES Permits.

Within forty five (45) days of receipt of this letter, respond to EPA-CEPD in writing with the actions that MSJ and PRASA has taken or will take to address the non-compliance items and areas of concern identified in the report. MSJ and PRASA must add these items to its Action Registry, and work to correct these items in an expeditious manner. However, if these items require extensive repairs and/or capital investments, than the work shall be scheduled in consideration of other priorities and the schedule included on the Action Registry.

If you have any questions please feel free to contact me at 787-977-5840.

Sincerely,


Janine Gélida
Chief
CEPD-MWPB

Enclosure

cc: Wanda E. García Hernández, Director, Water Quality Area, PREQB
Eng. María Matos, Municipality of San Juan, Environmental Affairs Program

bcc: M. Lantner, DECA-WCB electronically via email
C. Villafañe, CEPD-MPCB electronically via email
E. Huertas, CEPD-MPCB electronically via email



United States Environmental Protection Agency
Washington, D.C. 20460
Water Compliance Inspection Report

Form Approved
OMB No. 2040-0057
Approval expires 8-31-98

Section A: National Data System Coding (i.e., PCS)

Transaction Code		NPDES										yr mo/day		Inspection Type		Inspector		Fac Type	
1	N	2	5																
Remarks																			
21																			
Inspection Work Days																			
Facility Self-Monitoring Evaluation Rating																			
B1																			
QA																			
Reserved																			
67																			
69																			
7																			
71																			
72																			
73																			
74																			
7																			
80																			

Section B: Facility Data

Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time/Date	
Municipality of San Juan MS4 (Condado Lagoon Outfalls) P.O. Box 9024100, San Juan, Puerto Rico 00902-4100		04/05/13 1:30 PM	
		Exit Time/Date	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Permit Expiration Date	
Not Contacted – San Juan MS4 Eng. Maria Matos: mmatos01@sanjuancapital.com Executive Director Tel. No. (787) 480-2253 Environmental Affairs Program		04/05/13 4:30 PM	
Name, Address of Responsible Official/Title/Phone and Fax Number(s)		Other Facility Data	
Honorable Carmen Yulín Cruz Soto, Mayor Autonomous Municipality of San Juan P.O. Box 9024100 San Juan, Puerto Rico 00902-4100		Alberto M. Lázaro, P.E. Executive President, Puerto Rico Aqueduct and Sewer Authority (PRASA), Puerto Nuevo Regional WWTP, P.O. Box 7066, Barrio Obrero Station, San Juan, Puerto Rico 00916 NPDES Permit No. PR0021555	
Contacted			
Yes		X No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/>	Permit	<input type="checkbox"/>	Flow Measurement	<input type="checkbox"/>	Operations & Maintenance	<input type="checkbox"/>	CSO/SSO (Sewer Overflow)
<input type="checkbox"/>	Records/Reports	<input type="checkbox"/>	Self-Monitoring Program	<input type="checkbox"/>	Sludge Handling/Disposal	<input type="checkbox"/>	Pollution Prevention
<input checked="" type="checkbox"/>	Facility Site Review	<input type="checkbox"/>	Compliance Schedules	<input type="checkbox"/>	Pretreatment	<input type="checkbox"/>	Multimedia
<input checked="" type="checkbox"/>	Effluent/Receiving Water	<input type="checkbox"/>	Laboratory	<input checked="" type="checkbox"/>	Storm Water	<input type="checkbox"/>	Other: Pump Station

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached "Supplement to the Water Compliance Inspection Report".

Name(s) and Signature(s) of Inspector(s)		Agency/Office/Phone and Fax Numbers		Date	
Alex Rivera Environmental Engineer		EPA/CEPD/MWPB (787) 977-5845		6/19/13	
Evelyn Huertas Environmental Scientist		EPA/CEPD/MPCB (787) 977-5852		6/19/2013	
Signature of Management QA Reviewer		Agency/Office/Phone and Fax Numbers		Date	
Jaime Geliga, Chief		EPA/CEPD/MWPB (787) 977-5840		6/19/13	

**SUPPLEMENT TO WATER COMPLIANCE INSPECTION REPORT FORM
(EPA FORM 3560-3 (REV 9-94))**

CONDADO LAGOON SANITARY AND STORM SEWER SYSTEM

Reconnaissance Inspection: Puerto Rico Aqueduct and Sewer Authority
Condado Sanitary Sewer System
Puerto Nuevo Regional Wastewater Treatment Plant
Permit No. PR0021555

Municipality of San Juan Municipal Separate Storm
Sewer System (MS4) Permit (PRR040036)

Inspection Date: April 5, 2013

Inspectors: Alex Rivera, Environmental Engineer,
USEPA Region 2, CEPD-MWPB,
(787) 977-5845

Evelyn Huertas, Environmental Scientist,
USEPA Region 2, CEPD-MPCB
(787) 977-5852

I. Background:

On April 5, 2013, EPA conducted a Reconnaissance Inspection (RI) at the Condado Sanitary Sewer System (SSS), specifically at the Aguadilla and Mayagüez Streets, in San Juan, Puerto Rico. The Puerto Nuevo Regional Wastewater Treatment Plant (WWTP) receives wastewater via gravity sewers and by pumping.

The Municipality of San Juan (MSJ) operates a municipal separate storm sewer system (MS4) located in San Juan, Puerto Rico. During the RI the majority of the MSJ MS4 outfalls around the Condado Lagoon were inspected.

II. Inspection Purpose:

The San Juan Bay Estuary Program (SJBEP) participated in the RI, and represented by Ernesto Olivares, SJBEP Water Quality Program Coordinator. The purpose of the RI was to identify any source of wastewater pollution affecting the Condado Lagoon, which is part of the San Juan Bay Estuary. Based on the SJBEP water quality program, there are several sampling points that showed high values of parameters related to wastewater (Fecal Coliforms and Fecal Enterococcus) in the past.

EPA visited several points identified by the SJBEP to identify any dry-weather discharge from the storm water collection system or problems with the wastewater collection system. There was no rain during the time of the inspection. The temperature at the time of the inspection was 86 °F.

III. Inspection Findings:

The findings of the RI are included below:

- 1) **Mayagüez and Aguadilla Streets (Northeast of the Condado Lagoon) Condado SSS:**
 - a. Wastewater manhole #1, Mayagüez and Aguadilla Streets Intersection at corner of Vanderbilt Lagoon #54. The manhole appears to be clogged or the line is overcapacity. It was observed filled with wastewater to an estimated depth of eight (8) inches below the manhole upper ring. (See photos #1 and #2).
 - b. Wastewater manhole #2, Aguadilla Street, in front of Restaurant/Hotel Olives. The manhole appears to be clogged or the line is overcapacity. It was observed filled with wastewater to an estimated depth of 8 inches below the manhole upper ring. See photos #3 and #4). Based on conversations with the residents, wastewater overflows at this point are common, not only during wet-weather, but also during dry-weather.
 - c. Wastewater manhole #3, Aguadilla Street, in front of Esteban's Restaurant. The manhole was observed with high levels of solids, grease, and wastewater. The wastewater observed had an unusual orange color, and a strong grease odor, see photo #5 and #6.
 - d. PRASA's San Juan Operations personnel were also notified about the high levels of wastewaters in their sanitary pipelines in this area.
 - e. The storm water outfall in front of the Vanderbilt Lagoon #54 at Mayagüez Street was also inspected and no dry-weather discharges were observed during the inspection. See photo #7.
 - f. A manhole structure (manhole #4) was observed at the walkway of the Aguadilla Street, in the corner of Esteban's restaurant. We need to know whether or not it is a sanitary or storm water collection system manhole. The inside of the manhole structure has a four (4) inch PVC pipe connection and another four (4) inch rusty pipe. In general, the structure is in bad conditions. See photo #8.
 - g. Wastewater manhole #5, Aguadilla Street, in front of Colombo Bar and Restaurant. We observed a white colored flow, see photo #9 and #10.
 - h. The findings were referred to PRASA's Pretreatment Division, because the area has many restaurants in operation.
 - i. **This area is considered a potential area of non-compliance that needs further investigation by both PRASA and the MSJ.**

2) **Condado Lagoon MSJ MS4 Outfalls:**

- a. The Condado Lagoon MS4 serves part of the communities of Miramar and Condado in San Juan, Puerto Rico.
- b. The RI findings and comments are based on the walk-through observations and the interview to SJBEP representative: Mr. Ernesto Olivares. The findings were:
 - i. **Mayagüez Street:** Coordinates: 18° 27' 27.46" N – 66° 04' 35.65" W. No dry-weather flow was observed at this outfall. See photo #7. **This is an area of concern that need to be monitored by MSJ, based on the apparent situation of recurrent overflows mentioned above at findings item #1.**
 - ii. **Concrete rectangular storm water discharge structures near the end of Vieques Street and Jaime Benítez Park parking lot:** Coordinates: 18° 27' 18.08" N – 66° 04' 30.01" W. Two (2) rectangular storm water structures were found. Turbid and grayish water flow was observed in both structures. One of the structures has approximately 36 inches of width and the other at least 72 inches wide. See photo #11 and #12. **This is a potential non-compliance point of discharge of pollutants that needs further investigation by MSJ.**
 - iii. **Monserate Street/Baldorioty de Castro Expressway (in front of Cosmopolitan Condominium):** Coordinates: 18° 27' 17.02" N – 66° 04' 38.78" W. Dry weather flow was observed, the source appears to be a drinking water line leakage.
 - iv. **Cuevillas Street/Baldorioty de Castro Expressway:** Coordinates: 18° 27' 17.02" N – 66° 04' 38.78" W. Turbid dry weather flow was observed at this location. **This is a potential non-compliance point of discharge of pollutants that needs further investigation by MSJ.**
 - v. EPA did not observed any dry-weather flows at any other location.
 - vii. In general, the Condado Lagoon storm water structures appear to be in bad conditions. Most of the concrete pipes were found clogged with sand and rocks or partially broken. MSJ shall assess the condition of the storm water collection system in the Condado Lagoon area.

Conclusion:

- 1) Sewage (e.g., wastewater) is a pollutant as defined by Section 502(6) of the Clean Water Act (the Act), 33 U.S.C. § 1362.
- 2) The Condado Lagoon and the Atlantic Ocean are waters of the United States as defined by the Act.
- 3) The Condado SSS and the MSJ's MS4 are point sources as defined by the Act.
- 4) The Condado SSS is an appurtenance of the PRASA and a point source as defined by the Act.
- 5) The MS4 is an appurtenance of the Municipality of San Juan and a point source as defined by the Act.
- 6) The Condado SSS and the MSJ's MS4 discharge by gravity, in some areas, storm and wastewaters (e.g., illicit discharges) into the Condado Lagoon.
- 7) PRASA and the MSJ are potentially discharging pollutants (e.g., wastewater) into the Condado Lagoon, and the Atlantic Ocean by the use of the MS4. Although PRASA and the MSJ have NPDES Permits No. PR0021679 and PRR040036 respectively, they do not have NPDES permits to discharge pollutants (e.g., sewage, solids) into the MS4 and eventually reaching the Condado Lagoon.
- 8) MSJ and PRASA shall investigate and assess the condition of the areas of concern and potential areas of non-compliance identified and described above.

Report prepared by: Alex O. Rivera
Eng. Alex O. Rivera
Environmental Engineer

Dated: May 21, 2013

Attachment I – Location Maps

Attachment II – Inspection Photo Documentation

ATTACHMENT I

Location Maps



Rectangular storm water
discharge structures

Jaime Benítez Park

Condado Lagoon

Image © 2013 DigitalGlobe

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Expreso Rm
Calle Vieques
Calle de Castro

ATTACHMENT II

Photo Documentation

Condado Lagoon Wastewater and MS4 systems RI Photo Log



Photo 1

Wastewater manhole #1

Mayagüez and Aguadilla
Streets Intersection at
corner of Vanderbilt
Lagoon #54

Photo 2

Partial view of wastewater
manhole #1

Mayagüez and Aguadilla
Streets Intersection at corner
of Vanderbilt Lagoon #54





Photo 3

Wastewater manhole #2

Aguadilla Street, in front of
Restaurant/Hotel Olives

Photo 4

Partial view of wastewater
manhole #2

Aguadilla Street, in front of
Restaurant/Hotel Olives





Photo 5

Wastewater manhole #3

Aguadilla Street in front of
Esteban's Restaurant

Photo 6

Partial view of wastewater
manhole #3

Aguadilla Street in front of
Esteban's Restaurant





Photo 7

Storm water outfall at
Mayagüez Street in front of
Vanderbilt Lagoon #54.

Photo 8

Partial view of manhole #4

Aguadilla Street, corner of
Esteban's Restaurant.





Photo 9

Wastewater manhole #5

Aguadilla Street in front of
Colombo Bar/Restaurant

Photo 10

Partial view of wastewater
manhole #5

Aguadilla Street, in front of
Colombo Bar/Restaurant





Photo 11

Storm water discharge
structure

Near end of Vieques Street
and Jaime Benítez Park
parking lot

Photo 12

Storm water discharge
structure

Near end of Vieques Street
and Jaime Benítez Park
parking lot

